



## TRUTH, JUSTICE AND 498A: LESSONS FROM RAJESH CHADDHA V. STATE OF U.P

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Nandani\*

### INTRODUCTION

This case comment examines the landmark judgment of the Supreme Court of India in *Rajesh Chaddha v. State of U.P.*<sup>1</sup> In this case, the real question is that are vague, general, and uncorroborated allegations sufficient to sustain a conviction under Section 498A IPC and Section 4 of the Dowry Prohibition Act or should courts adopt a more cautious approach in matrimonial offence cases to prevent the misuse of protective laws? The verdict deals with the essential evidentiary thresholds for conviction under Section 498A of the Indian Penal Code (IPC) and Section 4 of the Dowry Prohibition Act. The Court emphasised the need for specific, credible allegations, especially when implicating extended family members, to avoid misuse of dowry laws. The Supreme Court reassessed long-standing convictions. The Court emphasised that vague, uncorroborated allegations—lacking specificity and independent evidence—are insufficient for conviction, especially when they involve distant relatives. This case is an important ruling by the Supreme Court of India that deals with sensitive issues in marriage-related criminal cases, specifically, allegations of cruelty and dowry harassment. In many such cases, serious accusations are made under Section 498A of the Indian Penal Code and Section 4 of the Dowry Prohibition Act. But this case raised a critical question: Is it fair to convict someone based only on vague or unsupported claims? The Court was asked to decide whether general allegations—without clear evidence or specific details—should be enough to punish someone under these laws. At the same time, it had to consider whether some people might misuse these legal protections for personal reasons. This case shines a light on the need for a fair and balanced approach. On one hand, it's vital to protect real victims of domestic abuse and dowry-related cruelty. But on the other hand, it's equally important to make sure that innocent people aren't falsely accused or unfairly punished. The

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\*BA LLB, FIRST YEAR, MAHARISHI MARKANDESWAR (DEEMED TO BE UNIVERSITY), MULLANA, AMBALA.

<sup>1</sup> 2025 INSC 671;2025 Live law (SC )563

judgment encourages courts to seek strong and believable evidence before reaching a verdict in such sensitive cases.

### **CASE DETAILS**

Title - Rajesh Chaddha v. State of Uttar Pradesh

Citation - 2025 INSC671;

Court - Supreme Court of India

Judges - Justice B.V. Nagarathna and Justice Satish Chandra Sharma

Date of judgment - May 13, 2025

Provisions Involved: Section 498A, IPC<sup>2</sup> – Cruelty by husband or relatives of husband; & Section 4, Dowry Prohibition Act,<sup>3</sup> and Penalty for demanding dowry.

### **BACKGROUND OF THE CASE**

In his case, a man from Lucknow named Rajesh Chaddha married a school teacher, Mala Chaddha, on February 12, 1997. According to the claimant – wife, she was subjected to repeated torture and physical injury for not bringing sufficient dowry. She claimed to have been ousted from the matrimonial home multiple times and alleged that she suffered a miscarriage due to physical assault by her husband and in-laws. On December 20, 1999, Mala Chaddha filed an FIR at the local police station alleging cruelty and dowry. She claimed that her husband had demanded 2 lakhs as additional dowry and subjected her to physical and mental abuse. After the filing of this FIR, the police initiated action, after which the husband's family appealed against this FIR in court. This FIR was registered on December 20, 1999, whereas the divorce petition in court under Section 13 of the Hindu Marriage Act, 1955, was filed on February 6, 1999. This indicates that the FIR was registered by the wife about 10 months after the divorce petition.

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<sup>2</sup> Indian penal code, 1860 section 498A

<sup>3</sup> Dowry prohibition Act, 1961 section 4

## JUDICIAL HISTORY

**Trial Court (2004):** The trial court acquitted the Appellant for offences under Section 323 r/w<sup>4</sup> 34<sup>5</sup> and Section 506 IPC<sup>6</sup> and convicted him for offences under Section 498A IPC and Section 4 of the D.P. Act, 1961. The trial court sentenced the appellant to 3 years. **The session court** upheld the conviction. The High Court of Allahabad upholds the lower court's findings. After two decades of court battle, the Supreme Court in 2025 overturned all the judgments and acquitted the husband of all criminal convictions (498A) and dowry prohibition).

## SUPREME COURT OBSERVATION

**Lack of Specific Allegations:** The allegations against relatives were vague, without particular details or corroborative evidence. Naming all relatives without detailing individual acts of cruelty raised serious concerns.

**Insufficient Evidence:** The only Evidence given by the claimant was a statement of the claimant (PW-1) and her father (PW-2). They had made allegations without any Specifics of date, time or event.

**Credibility of FIR:** FIR dt. 20.12.1999 was registered after the appellant had filed the Divorce Petition and that the Complainant had cohabited with the appellant only for about a year, it appears that the FIR Registered by the Complainant was not genuine.

**No Medical Report:** As the claimant (wife) alleged that she had suffered a miscarriage and sustained injuries due to the result of physical assault, however, no medical document from any medical hospital or institution was produced before the court.

## JUDGEMENT SUMMARY

- The FIR was vague, lacked material particulars (such as dates, specifics of cruelty), and read like a template narrative.
- The trial court erred in relying solely on uncorroborated testimony from the complainant, without any independent or medical evidence.

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<sup>4</sup> r/w means “read with”

<sup>5</sup> Section 323 r/w 43 means that multiple individuals, acting with a common intention, are jointly liable for voluntarily causing hurt to another person.

<sup>6</sup> Section 506 of the Indian Penal Code (IPC) deals with criminal intimidation, which involves threatening someone with harm to their person, property, or reputation. Punishment can include imprisonment for up to two years, a fine, or both.

- The Court expressed deep concern over the misuse of Section 498A to settle personal scores, noting a disturbing trend of prolonged litigation used as a weapon.
- The Court observed that legal proceedings had turned into a “judicial punishment” by process, violating the principle of fair trial and timely justice.

## LEGAL ANALYSIS

**Prevention of Misuse of Law:** The court sought to maintain a balance between protecting genuine victims and preventing the misuse of law, like section 498a, IPC and anti-dowry laws. In the case of *Arnesh Kumar v State of Bihar*<sup>7</sup>, the Supreme Court emphasised the need to prevent misuse of Section 498A IPC and provided specific guidelines for police officers when arresting individuals in cases punishable by imprisonment of up to seven years.

**Interpretation of Section 498A:** The judgment reinforces that Section 498A aims to penalise cruelty by the husband or his relatives. However, for a conviction to stand, the prosecution must establish that there were specific incidents of cruelty, either physical or mental, with supporting evidence. It is also defined that mere grievances are not sufficient proof of cruelty and dowry demands. In the case of *K. Subba Rao v State of Telangana*<sup>8</sup>, the Court held that cruelty under Section 498A must be proven with specific incidents, and vague or general allegations are not sufficient.

**Value of Corroborative and Medical Evidence:** In evaluating serious charges like forced miscarriage and sustained injuries, the Court stressed the importance of medical or independent corroboration. In the case of *Rajesh Sharma v State of UP*<sup>9</sup>, the Court issued guidelines on how to deal with complaints under Section 498A, stressing the need for evidence beyond mere allegations.

## IMPACT AND SIGNIFICANCE

**Reinforcement of Judicial Safeguards Against Misuse:** This judgment adds to a growing body of Supreme Court rulings that caution against the misuse of Section 498A IPC. By acquitting co-accused relatives due to vague and general allegations, the Court has strengthened individualised scrutiny in criminal trials.

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<sup>7</sup> *Arnesh Kumar v State of Bihar* (2014) 8 SCC 273

<sup>8</sup> *K. Subba Rao v State of Telangana* (2018) 14 SCC 452

<sup>9</sup> *Rajesh Sharma v State of UP* (2017) 8 SCC 746

**Promotion of Evidentiary Discipline in Dowry Cases:** The judgment makes it clear that serious allegations such as forced miscarriage or dowry demands must be supported by credible, preferably medical or documentary, evidence.

**Precedential Value for Lower Courts:** This ruling serves as binding precedent on how trial and appellate courts should handle the delay in filing FIRs and the lack of corroborative evidence in domestic violence or dowry cases.

## CONCLUSION

In this landmark judgment, the Supreme Court of India strongly emphasized the importance of truthful, specific, and well-supported allegations when dealing with criminal cases involving Section 498A (IPC)<sup>10</sup>(which deals with cruelty by a husband or his family towards a wife) and Section 4 of the Dowry Prohibition Act<sup>11</sup> (which prohibits giving or taking dowry). The Court concluded that vague and unproven allegations—especially those without any solid evidence or witness support—cannot be used as a basis for convicting someone. In other words, just because someone makes a serious accusation doesn't mean it's automatically true or legally enough to punish the accused. The Court also recognised a growing concern: that sometimes, protective laws created for the safety of women are being misused or abused in family disputes. It stated that such misuse weakens the credibility of genuine cases and leads to injustice against innocent people, often husbands and their relatives. Therefore, the judgment sets a clear standard: courts must be cautious, fair, and require credible evidence before convicting anyone. They must distinguish between genuine cases of cruelty or dowry harassment and those that may be motivated by malice, revenge, or personal disputes. Ultimately, the Court called for a balanced approach in protecting the rights of victims while also ensuring that accused persons are not unfairly punished without proof. It stressed the importance of using these legal provisions judiciously and responsibly.

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<sup>10</sup> Indian penal code, 1860 section 498A

<sup>11</sup> The Dowry prohibition Act, 1961 section 4